

THE HONORABLE JOHN C. COUGHENOUR

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

IN RE VALVE ANTITRUST LITIGATION

No. 2:21-cv-00563-JCC

**PRAECIPE REGARDING VALVE
CORPORATION'S MOTION TO SEAL
OPPOSITION TO CLASS
CERTIFICATION, SCHWARTZ
REPORT, AND SUPPORTING
DOCUMENTS**

PRAECIPE REGARDING VALVE CORPORATION'S
MOTION TO SEAL
CASE NO. 2:21-cv-00563-JCC – 1

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Pursuant to Local Civil Rule 7(m), Defendant Valve Corporation submits this praecipe to substitute a corrected form of:

(1) Declaration of Scott Lynch with Appendix (Dkt. 295) in support of Valve's Motion to Seal Opposition to Class Certification, Schwartz Report, and Supporting Documents (Dkt. 294);

(2) Valve's Proposed Redactions to the Expert Report of Steven Schwartz (Dkt. 298-2);

(3) Valve's Proposed Redactions to the Expert Report of Lesley Chiou (Dkt. 298-5);

and

(4) Valve's Proposed Redactions to the Expert Report of Ashley Langer (Dkt. 298-6).

On June 28, 2024, Valve discovered a small number of inaccuracies in the documents listed above. Certain references were improperly listed for redaction in the Appendix to the Declaration of Scott Lynch and/or improperly highlighted for redaction. Other references were either (i) listed for redaction in the Appendix to the Declaration of Scott Lynch but not correspondingly highlighted for redaction or (ii) highlighted for redaction but not correspondingly listed for redaction in the Appendix to the Declaration of Scott Lynch.

To address those inaccuracies, Valve has made the following changes:

Appendix to the Declaration of Scott Lynch (Dkt. 295) (**Exhibit A**)

- Removed "¶ 410" from list of Schwartz Report redactions in Appendix A1 (Valve does not seek redaction of dollar figures in the last line of ¶ 410)
- Removed "p. 89 n. 399" from list of Schwartz Report redactions in Appendix A2 (Valve does not seek redaction of p. 89 n. 399)
- Added "¶ 226" & "¶ 267" to the list of Chiou Report redactions in Appendix C1
- Added "p. 205 n. 854" to the list of Schwartz Report redactions in Appendix E1
- Corrected "p. 76 312" to "p. 76 n. 312" in the list of Chiou Report redactions in

Appendix F1

- Added “p. A21 n. 21” to the list of Schwartz Report redactions in Appendix F3
- Corrected “p. 28 Exhibit 17” to “p. 128 Exhibit 17” in the list of Chiou Report redactions in Appendix H

Expert Report of Steven Schwartz (Dkt. 298-2) (Exhibit B) (filed under seal)

- Paragraph 132 (highlighted proposed redactions to market share percentages)
- Paragraph 273 (added highlight to total market revenue figure)
- Paragraph 410 (removed highlighting to reflect that Valve does not seek redaction of dollar figures in the last line of ¶ 410)

Expert Report of Lesley Chiou (Dkt. 298-5) (Exhibit C) (filed under seal)

- Page 93, Note 348 (highlighted proposed redaction to percentage value)

Expert Report of Ashley Langer (Dkt. 298-6) (Exhibit D) (filed under seal)

- Page 56, Exhibit 2 (removed redaction)

Valve respectfully requests that a corrected Declaration of Scott Lynch (Dkt. 295) in the form attached hereto as **Exhibit A**, and corrected exhibits to the Declaration of Blake Marks-Dias in Support of Valve’s Motion to Seal (Dkt. Nos. 298-2, 298-5, 298-6), in the form attached hereto as **Exhibits B–D (filed under seal)**, be substituted for the currently filed documents. Lynch Declaration **Exhibit A** and Marks-Dias Declaration **Exhibits B–D** contain no changes other than those described above.

DATED this 2nd day of July, 2024.

s/ Blake Marks-Dias

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